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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JANIS L. SAMMARTINO)

UNITED STATES OF AMERICA, Plaintiff, v. FRANCISCO DE LA CONCHA, Defendant.	)	Case No. 08CR0711-JLS DATE: April 18, 2008 TIME: 9:00 A.M. NOTICE OF MOTIONS AND MOTIONS TO: 1) COMPEL DISCOVERY; AND 2) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
STEVE MILLER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that, on January 14, 2008 at 9:00 a.m., or as soon thereafter as counsel may be heard, defendant, Francisco De la Concha, by and through his attorneys, Erick L. Guzman, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

Defendant, Francisco De la Concha, by and through his attorneys, Erick L. Guzman, and Federal Defenders of San Diego, Inc., asks this Court, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules, for an order to:

(1) Compel Discovery; and

(2) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

DATED: April 4, 2008

/s/ ERICK L. GUZMAN

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